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April 23, 2021

The Honorable Richard J. Sullivan
U.S. Court of Appeals for the Second Circuit
40 Foley Square
New York, NY 10007

**Re: *Tera Group, Inc., et al. v. Citigroup, Inc., et al.*, 17-cv-4302-RJS
(S.D.N.Y.)**

Dear Judge Sullivan:

Covington & Burling LLP (“Covington”) is counsel to the JPMorgan defendants in the above-captioned matter pending before Your Honor.

Jeanne Jeong, one of your former law clerks, joined Covington on April 19, 2021, as an associate in the firm’s New York office. I write pursuant to New York Rule of Professional Conduct 1.12, which (i) bars a former law clerk from representing a client in connection with a matter in which he or she participated personally and substantially while clerking, and (ii) describes notification and screening requirements that must be put in place to ensure that the former law clerk does not share information regarding the matter with others at the firm. This letter describes Covington’s compliance with the requirements of Rule 1.12.

Ms. Jeong will not participate in Covington’s representation of JPMorgan in the above-captioned litigation. Lawyers and non-lawyer personnel within Covington have been notified that they may not seek her assistance in Covington’s activity with respect to this matter, discuss this matter with her or in her presence, pose hypothetical questions to her based on the facts of this matter, or otherwise seek to utilize her knowledge, experience, or assistance in this matter or any related matter. Ms. Jeong is not permitted to share information about this matter with others at Covington (other than as necessary to identify the matters appropriate for screening) and will be apportioned no part of the fee therefrom.

If the Court requires any additional information concerning this matter, please let us know, and we will be happy to provide it.

Respectfully submitted,

s/ Andrew Lazerow

Andrew Lazerow

Cc: All Counsel (by ECF)